

ORIGINAL

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EX PARTE OR LATE FILED

November 3, 1999

Magalie Roman-Salas  
Secretary  
Federal Communications Commission  
445 - 12<sup>th</sup> Street, S.W.  
Washington, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

Re: Ex Parte Communication: CC Docket No. 99-295

Dear Ms. Salas:

On behalf of CoreComm Limited and CoreComm New York, Inc. ("CoreComm"), we submitted comments on October 19, 1999, in response to the Bell Atlantic-New York *et al.*, request for authority to offer interLATA services in New York. In those comments, CoreComm identified several reasons why it believed Bell Atlantic's application should not be granted. Further investigation, however, necessitates a clarification of the record with respect to one issue.

The discussion beginning at the bottom of page 15 of CoreComm's comments and extending to the top of page 17 pertains to the timeliness of Bell Atlantic's wholesale bills received by CoreComm. Following the submission of its Comments to the Commission on October 19, CoreComm has continued to investigate the record as it relates to the timeliness of Bell Atlantic's wholesale bills. As a result of the information obtained in the course of this investigation CoreComm wishes to make the following clarification.

CoreComm utilizes an agent to receive the billing data tapes from Bell Atlantic. Generally, CoreComm receives the billing data information from its agent within twenty-four hours of the agent's receipt of the billing data tape from Bell Atlantic. Through our continuing investigation, we have determined that, for some of the instances identified in the Comments, there was a longer delay between the time the agent received the data and time of its receipt by CoreComm. Because of this delay, CoreComm did not receive the wholesale billing data tape within ten business days, although the agent did. Obviously, in those circumstances, Bell Atlantic cannot properly be faulted for late delivery of wholesale bills to CoreComm.<sup>1/</sup>

<sup>1/</sup> It appears that for the four instances of late bills identified in CoreComm's comments for the months of June and July, the billing tapes were timely received by CoreComm's agent. For the

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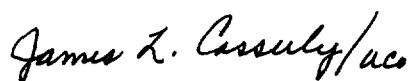
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This is not to say that CoreComm has no billing problems with Bell Atlantic. For example, apart from the question of the timeliness of the billing data tape, CoreComm continues to experience problems with Bell Atlantic's wholesale bills. One such problem is that Bell Atlantic sends a paper invoice to CoreComm for wholesale services after the billing data tape is sent. At times, there are delays of up to a week or more from the time the billing data tape is received by CoreComm to when the paper invoice is received. This paper invoice is critical. It contains the total amount that Bell Atlantic expects to be remitted for the current billing period and any amounts it contends are owed from previous bills and provides the form for remittance. Often, the amounts on the paper invoice are different from the totals contained in the billing data tapes, even though they cover the same billing period. This variance requires CoreComm to attempt to reconcile the information on tape with the amounts due on the invoice. Because the paper invoice is at times received so late in the thirty-one day billing cycle, it is extremely difficult for CoreComm to audit and reconcile the bills and remit timely payment to Bell Atlantic.

In short, billing issues remain one of the areas in which CoreComm is not yet receiving the quality of service from Bell Atlantic that it needs. In light of our ongoing investigation into the timeliness of wholesale billing information, however, CoreComm withdraws its specific assertions regarding the seven wholesale bills received outside of the ten business day standard during the period of June through August.

I appreciate this opportunity to clarify the record. Please contact me if you have any questions.

Sincerely,

Handwritten signature of James L. Casserly in cursive script.

James L. Casserly

cc: Janice Myles  
Andrea Kearney  
Michael Glover

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three instances in August, delays in CoreComm's receipt of the billing tape appear to have been due to modifications in the tape format made by Bell Atlantic without notification. Due to these modifications made without notification, CoreComm's agent did not deem the tapes acceptable, which caused delays in CoreComm's receipt of the tapes.